

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.)
)
126 DRUMS OF HONEY SEIZED ON APRIL 4,)
2008, in Minneapolis, Minnesota;)
)
449 DRUMS OF HONEY SEIZED ON MAY 30,)
2008, in Glenview, Illinois;)
)
551 DRUMS OF HONEY SEIZED ON JUNE 24,)
2008, in Glenview, Illinois;)
)
256 DRUMS OF HONEY SEIZED ON JULY 22,) No. 09 C 5530
2008, in Tacoma, Washington;)
)
189 DRUMS OF HONEY SEIZED ON) Judge Robert W. Gettleman
SEPTEMBER 18, 2008, in Bensenville, Illinois;)
)
124 DRUMS OF HONEY SEIZED ON)
SEPTEMBER 23, 2008, in Minneapolis, Minnesota;)
)
126 DRUMS OF HONEY SEIZED ON)
NOVEMBER 12, 2008, in Eagan, Minnesota;)
)
174 DRUMS OF HONEY SEIZED ON)
DECEMBER 12, 2008, in Itasca, Illinois; and)
)
446 DRUMS OF HONEY SEIZED ON)
DECEMBER 12, 2008, in Itasca, Illinois,)
)
Defendants *in rem*.)

**THE UNITED STATES' MOTION
FOR ENTRY OF A DECREE OF FORFEITURE**

The United States of America, by Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, moves this court for the entry of a decree of forfeiture. In support of this motion, the United States of America states as follows:

1. On September 4, 2009, the United States filed a verified complaint seeking forfeiture of the defendant property pursuant to Title 18, United States Code, Section 981(a)(1)(C).¹
2. On September 8, 2009, the court issued arrest warrants *in rem* to be executed by the United States Department of Homeland Security against the defendant property.
3. On October 13, 2009, the defendant property was seized, the warrants were executed and the verified complaint was personally served by the United States Department of Homeland Security.
4. The United States gave notice of this action to all known potential claimants and record owners by electronic and certified mail.
5. Pursuant to Rule G(4)(a) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, notice of the civil judicial forfeiture proceeding was posted on an official government internet site for at least 30 consecutive days beginning on September 15, 2009.
6. On October 19, 2009, Alfred L. Wolff, Incorporated (“Wolff”) filed a claim to the defendant property. On April 28, 2011, Wolff filed a motion to withdraw the claim. The court granted that motion and Wolff’s claim was withdrawn on May 4, 2011.
7. No other party filed a claim to the defendant goods.

¹The civil complaint was amended twice on September 14, 2009 and March 25, 2011

8. Based on the second amended verified complaint and the attached affidavit of Matthew Gauder of the United States Department of Homeland Security, Immigration and Customs Enforcement, the United States has established that the defendant property was knowingly imported or brought into the United States in violation of Title 18, United States Code, Sections 542 and 545(a)(6) and is therefore subject to forfeit to the United States pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C).

WHEREFORE, the United States of America requests that this court enter a decree of forfeiture in favor of the United States of America and against the defendant property. A draft order is submitted herewith.

Respectfully submitted,

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